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Attorney for Defendant
CARRIE MARIE SULAK

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR-S-04-0218 MCE
)	
Plaintiff,)	
)	STIPULATION AND {PROPOSED} ORDER
v.)	
)	
CARRIE MARIE SULAK, et al.)	Date: November 1, 2005
)	Time: 8:30 a.m.
Defendants.)	Judge: Hon. Morrison C. England
)	
_____)	

It is hereby stipulated and agreed to between the United States of America through Phil Ferrari, Assistant U.S. Attorney; defendant, CARRIE MARIE SULAK, by and through her counsel, Dennis S. Waks, Supervising Assistant Federal Defender that the status conference of October 25, 2005 be vacated and a further status conference be set for November 1, 2005 at 8:30 a.m.

This continuance is being requested because defense counsel requires additional time to obtain discovery, continue our investigation, and to interview our client and other witnesses. Furthermore, the parties are negotiating a plea agreement and need time to reduce it to writing and provide it to the Court. Defense counsel

1 needs time to discuss the plea with the prosecutor and with the
2 defendant.

3 Speedy trial time is to be excluded from the date of this order
4 through the date of the status conference set for November 1, 2005,
5 pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv) and Local Code T4 based upon
6 continuity of counsel and defense preparation.

7 Dated: October 21, 2005

8 Respectfully submitted,

9 QUIN DENVIR
Federal Defender

10 /s/ Dennis S. Waks

11 _____
12 DENNIS S. WAKS
13 Supervising Assistant Federal
14 Defender
Attorney for Defendant
CARRIE MARIE SULAK

15 Dated: October 21, 2005

16 MCGREGOR W. SCOTT
17 United States Attorney


18 /s/ Dennis S. Waks for

19 _____
20 PHIL FERRARI
Assistant U.S. Attorney

21 O R D E R

22 IT IS SO ORDERED.

23 Dated: October 21, 2005

24 
25 _____
26 MORRISON C. ENGLAND, JR.
27 UNITED STATES DISTRICT JUDGE
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